

Tutor Developers, Tutors and Mentors Privacy Policy

Summary of how we use your data

- The FA uses your personal data in order to maintain a record on the approved FA Tutor Developers, Tutors or Mentors suitable to carry out The FA's educational courses.
- Data is shared with the County FAs; specifically each County FA is sent a list of the FA Tutor Developers, Tutors and Mentors in its area.
- Where we rely on your consent, such as for the processing of diversity or ethnicity information, you can withdraw this consent at any time.
- Our privacy policy sets out more details of your data protection rights, including your right to object to certain processing.

What does this policy cover?

This policy describes how The Football Association Limited (also referred to as "The FA ", "we" or "us") will make use of your data when you are an FA approved Tutor Developer, Tutor or Mentor.

It also describes your data protection rights, including a right to object to some of the processing which The FA carries out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

What information do we collect?

We collect and process personal data about you when you are an approved FA Tutor Developer, Tutor or Mentor. This includes:

- your name;
- your FA number (FAN);
- your home address, email address, phone number;
- your gender;
- details of your experience and expertise;
- your current employment status; and
- your qualifications.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular we may receive information from your County FA for example, in relation to a change of your personal details.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- as required by The FA to conduct our business and pursue our legitimate interests, in particular:

- communicating with you or about you where necessary to administer appropriate FA affiliated educational courses;
 - monitoring the list of approved Tutor Developers, Tutors and Mentors in specific regions;
 - monitoring the expertise of Tutor Developers, Tutors and Mentors in specific regions;
 - we will use your information to provide products and services you have requested, and respond to any comments or complaints you may send us;
 - we use information you provide to investigate any complaints received from you or from others, or services; and
 - we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).
- Where you give us consent:
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
 - For purposes which are required by law:
 - in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever The FA or your County FA relies on your consent, you will always be able to withdraw that consent, although they may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, The FA and your County FA are able to send you direct marketing without your consent, where they rely on their legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling that The FA or your County FA carries out for direct marketing, at any time. You can do this by contacting the relevant organisation using the details set out below.

Who will we share this data with, where and when?

We will share your personal data with County FAs for the purpose of informing them of the approved Tutor Developers, Tutors and Mentors in specific regions.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review – you can ask for this using the contact details below.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us – or our data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK.

How do I get in touch with you, or your data protection officer?

The FA hopes that it can satisfy queries you may have about the way it and your County FA processes your data. If you have any concerns about how your data is processed, or would like to opt out of FA direct marketing or profiling, you can get in touch at dataprotection@thefa.com or by writing to Data Protection Officer, Wembley Stadium, PO Box 1966, London, SW1P 9EQ.

Which entity is my data controller, and which affiliates might my data be shared with?

The data controllers for your information are The FA, and any County FA you register as your main or affiliate County. The relevant contact details for your County FA can be found at <http://www.thefa.com>.

How long will you retain my data?

The FA retains your data for as long as you are an approved Tutor Developer, Tutor or Mentor and for 6 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

Where your data is held on FA systems, then at the end of the retention periods set out above, we will not irrevocably delete your information for another 3 months – your data will be held in an inactive form for this time to ensure that any consequential links across our systems remain intact in the event that your data is removed in a particular location.